

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON**

In re

T D XAVIER

) Case No. 322-31672-THP13
)
) Confirmation hearing date: Dec 1, 2022
)
) **TRUSTEE'S OBJECTION TO**
) **CONFIRMATION AND MOTION**
) **TO DISMISS**
Debtor(s).

Wayne Godare, the Standing Chapter 13 Trustee Objects to Confirmation of the above case for the reason(s) set out below:

- _____ a. Plan is not feasible:
- _____ b. Case/Plan is not proposed in good faith or is forbidden by law:
- _____ c. Plan does not commit all of debtor's excess projected disposable income pursuant to 11 U.S.C. §1325(b)(1)(B) for the applicable commitment period:
- _____ d. Plan does not meet the best interest test of 11 U.S.C. §1325(a)(4):
- X** e. Filing/documentation is deficient: **As requested at the §341(a) hearing, please provide the Trustee with a complete true copy of the debtor's 2021 Federal and State Tax Returns.**
- X** f. Other: **As requested at the §341(a) hearing, please make the following changes to the Plan:**
1. **¶15 insert "(if ¶17 lien avoidance action is unsuccessful) after "Hyun Sook Mayben-Reynolds"; and**
 2. **¶17 add at the end of the sentence "If this preference action is unsuccessful, debtor shall amend the Plan to provide for payment of this secured creditor in ¶4(b).**

If by the time of the scheduled confirmation hearing, debtor fails to take all necessary steps to satisfy each objection marked above, or is not prepared to address the Trustee's objections with the filing of an amended plan as directed by the court during that scheduled confirmation hearing, the Trustee may, in his discretion, urge the court for an order dismissing the case without further notice.

I certify that on November 1, 2022, copies of the above Objection and Motion were served on the debtor(s) by first class mail and any debtor(s) attorney by ECF.

DATED: November 1, 2022

/s/ Wayne Godare, Trustee

TODD TRIERWEILER
(jt for mk)